1	DAVID G. EPSTEIN (SBN 84356) depsteinlaw@icloud.com		
2	THE DAVID EPSTEIN LAW FIRM		
3	PO Box 4858 Laguna Beach, CA 92652-4858		
4	(949) 715-1500 Fax (949) 715-2570		
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6	Attorneys for Plaintiff		
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9	UNITED STATES DI	STRICT COURT	
10	CENTRAL DISTRICT OF CALIFORNIA, SOUTHERN DIVISION		
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12	JOHN D. THOMAS,	Case No. 8:23-cv-00236-DOC-JDE	
13		Assigned for all purposes to:	
14	Plaintiff, ) vs. )	DECLARATION IN SUPPORT OF	
15	)	MOTION FOR ENTRY OF DEFAULT	
16	LEAGLE, INC., a former Arkansas )		
17	corporation; and DOES 1-25,		
18	Defendants.		
19	,		
20	I, David G. Epstein, declare:		
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22	1. I am the attorney for the plaintiff in the	1. I am the attorney for the plaintiff in the above-entitled action and I am familian	
23	with the file, records and pleadings in this ma	with the file, records and pleadings in this matter.	
24	2. The summons and complaint were se	erved upon the defendant on May 31,	
25	2023, in the manner authorized by the court in	2023, in the manner authorized by the court in its order dated April 14, 2023 (Docket	
26	17).		
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1	3. An answer to the complaint was due on June 22, 2023. No response was	
2	served within the time allowed by law and no request for additional time was received.	
3	4. Plaintiff requests that the clerk of court enter default against the defendant.	
4	5. If called as a witness, I could and would testify to the matters contained herein,	
5	which I know of my own personal knowledge, except for those matters stated upon	
6	information and belief, and as to them, I believe them to be true.	
7	I declare under penalty of perjury under the laws of the state of California that	
8	the foregoing is true and correct.	
9	Executed at Laguna Beach, California on August 8, 2023.	
10		
11	/s/ David G. Epstein	
12	David G. Epstein	
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